

time until September 20, 2023.

7. No extension has been granted to extend the time to file Appellee's brief.

8. Appellee requires additional time to file her brief because Appellee's counsel's schedule: (i) work on the following cases: *Kuhn v. CFHL*, Cause No. 4:23-cv-00308, U.S. District Court, Eastern District of Texas; *Linda Payne, Trustee v. Makani et al*, Adversary No. 21-04141, United States Bankruptcy Court, Eastern District of Texas, Sherman Division; and *In re: Geotel Investments, LLC, Debtor*, Case No. 23-41032, United States Bankruptcy Court, Eastern District of Texas, Sherman Division; and (ii) an unexpected conflict that arose by the indictment of a client in Georgia.

C. CONCLUSION

9. The Appellant is unopposed to this motion; the Appellee's counsel has conflicts that existed and a conflict that arose unexpectedly this week, which cannot be re-scheduled.

D. PRAYER

10. For these reasons, Appellee asks the Court to grant an extension of time to file her brief until September 20, 2023.

HOLMES LAWYER PLLC

By: /s/ Robert H. Holmes

Robert H. Holmes
SBN 09908400

19 St. Laurent Place
Dallas, Texas 75225
Telephone: 214-384-3182
email: rhholmes@swbell.net

ATTORNEY FOR APPELLEE

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Michael G. Graham, Appellant's counsel, on August 16, 2023, who stated that the Appellant is not opposed to an extension of not more than 30 days.

/s/ Robert H. Holmes
Robert H. Holmes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been delivered to the attorneys of record for Appellants on August 16, 2023, by efileTexas.gov.

/s/ Robert H. Holmes
Robert H. Holmes

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Holmes on behalf of Robert Holmes
Bar No. 9908400
rhholmes@swbell.net
Envelope ID: 78604226
Filing Code Description: Motion
Filing Description: Motion For Extension
Status as of 8/16/2023 3:23 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Michael Graham	24113581	Michael.Graham@TEXASBAR.COM	8/16/2023 3:18:24 PM	SENT